



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

JUN - 1 1995

Ref: 8WM-EA

Mr. William McMahan, Project Coordinator
Bureau of Land Management
P.O. Box 1869
Rock Springs, Wyoming 82902-1869

Subject: Fontenelle Natural Gas Infill
Drilling Projects DEIS

Dear Mr. McMahan:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency has reviewed the subject document.

The BLM is commended for selecting the Resources Protection Alternative for this project. Even so, the EPA believes the BLM should do more to evaluate the proposed action.

The EPA has serious concerns that the cumulative impacts from this and numerous other proposed oil and gas activities in Southwestern Wyoming are not being adequately evaluated. We have noted that each individual analysis has evaluated only incremental effects within its project boundary, which, when isolated from other large scale development activities, appear to have no significant impact. Cumulatively, oil and gas activity is significantly altering (or will) vast areas of Wyoming. These effects are not receiving adequate analysis. The failure to integrate information about adjacent field and basin development is typical of recent oil and gas EIS's for Wyoming. The Fontenelle, for example, gives little mention to the proposed Expanded Moxa Arch Area Natural Gas Development Project which shares boundaries. Moxa Arch would develop 1325 wells over 10 years on 476,261 acres. This large similar, connected, and cumulative action must be considered within the Fontenelle DEIS. Other existing or proposed developments that have similar, connected, and/or cumulative effects must also be included.

Clearly, BLM already recognizes the importance of the cumulative impacts associated with oil and gas development, as evident from the commitment to perform the Southwest Wyoming Resource Evaluation. Our concern is that the proposed timing for completing the evaluation will not be useful to the deciding official for making decisions on current oil and gas development proposals.



Printed on Recycled Paper

We have concerns with the potential air quality and water quality impacts associated with the project. In order for us to better access the potential environmental impacts of the proposed project we suggest that the following be included in the Final Environmental Impact Statement (FEIS):

1. All air emissions associated with the project should be quantified and displayed within the FEIS. These emissions might include the following: construction, traffic, hauling, and operation of the wells and resources processing and handling. These emissions should then be input to a screening dispersion model (SCREEN2) to estimate the potential impacts on the National Ambient Air Quality Standards (NAAQS).

2. If the baseline data for the modeled pollutants has been triggered within the project area, a Prevention of Significant Deterioration (PSD) Class I, II increment analysis should be performed to address the potential air impacts.

3. Also, a screening visibility analysis (VISCREEN) should be conducted to estimate the potential visibility impairment expected within nearby Class I areas.

4. While the majority of the potential impacts to waters of the US are to be avoided through the implementation of Best Management Practices (BMP'S) the document should include an analysis of the previous success of the various BMP'S. The FEIS should indicate how many road crossings of waters of the US have occurred to date, how many spills have been documented, how many contamination events have occurred, how many wetlands have been filled, and any other water related impacts that have occurred that the agency is aware of.

5. The EPA requests that BLM document in the FEIS all known water quality, air quality, and other environmental laws and regulations that have been violated to date in the project area. Also, the remedies to all of the violations should be included in the FEIS and measures that are to be taken in the future to eliminate any future violations. This provides a baseline of data from which to understand impacts and to determine what monitoring and evaluation should be established.

6. The FEIS should discuss all possible mitigation opportunities for adverse environmental impacts associated with the project. As an example, the amount of grazing allowed may be reduced in order to reduce the effect on game animal populations.

Based on the procedures EPA uses to evaluate the environmental impacts of the proposed action and alternatives and the adequacy of the information provided, the EPA Region VIII

rates the Draft Environmental Impact Statement EC-2
(Environmental Concerns, Insufficient Information). We request
that the above listed items be addressed in the FEIS.

EPA appreciates the opportunity to review the subject
document and all the effort which went into its preparation. If
you have any questions, please contact Carl Heskett of my staff,
at (303) 293-1557.

Sincerely,

Paul D. Mosper
for J. William Geise, Jr.
Acting Chief
Environmental Assessment Branch
Water Management Division